

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CR. NO. 17-20595

v.

HON. TERRENCE G. BERG

YOUSEF RAMADAN,

Defendant.

YOUSEF RAMADAN'S MOTION FOR PERMISSION TO TRAVEL

Yousef Ramadan, by his counsel Andrew Densemo & Amanda Bashi of the Federal Community Defender, requests this Court's permission to travel to Palestine (Bethlehem) for his brother's wedding, next week. In support of this motion, Mr. Ramadan provides as follows:

1. Mr. Ramadan was originally charged with three firearms related offenses in 2017. After spending over three years in pre-trial detention he was released on bond.
2. He was released on bond on January 15, 2021. He remained on bond until February 28, 2022.

3. On February 28, 2022 he was placed on two years supervised release as a result of his convictions on the firearm charges. No violation of bond occurred during this time. Mr. Ramadan remained on supervised release from February 28, 2022 through February 9, 2024. A violation petition resulted in Mr. Ramadan being sentenced to two months custody and three years supervised release.

4. Standard condition number three of supervised release prohibits Mr. Ramadan from leaving the federal district where he is living without the approval of the court or the probation officer.

5. Mr. Ramadan moves to temporarily suspend that particular standard condition so that he can attend his brother's wedding.

6. The wedding is scheduled to take place on May 3, 2024, in Bethlehem, Palestine (Exhibit A, Invitation). Mr. Ramadan proposes the following travel arrangements:

- a. He would fly from Detroit to Amman Jordan on April 28, 2024 on Royal Jordanian airlines flight number 268. He would return on Friday, May 24, 2024 on Royal Jordanian airlines flight number 267.
- b. Upon landing in Amman, Mr. Ramadan would take a taxi from Amman to the border city of Jericho (about 1 hour 20 minutes). He would then take a taxi from Jericho to Bethlehem (1 hour). Of

course, Mr. Ramadan would be subjected to check points at various times along this journey.

- c. Mr. Ramadan will be staying in Bethlehem with his wife and kids. Their names are Mohammad, Nadeem, Amjad, Ibtesam, and Jeanine. The address is Building 107 Manger Street-Al Mahd, Bethlehem, West Bank, Palestine. The GPS coordinates are 31°42'54"N 35°12'09"E. The following link is the google maps location where Mr. Ramadan will be staying:

<https://maps.app.goo.gl/tGbo6tJJKGHsHgbgv9>

- d. Mr. Ramadan would be happy to furnish any additional details or select alternative travel dates (so long as he can attend the wedding and visit his family) that would appease the Court and Probation.

7. Mr. Ramadan has a history of compliance with conditions of the court.

8. Mr. Ramadan is a U.S. citizen who has lived and worked in the U.S. for over 20 years.

9. Mr. Ramadan hasn't visited with his family in Palestine for nearly 10 years. He isn't facing any custodial sentences, nor are there other issues that would give him a reason not to return to the United States.

10. Mr. Ramadan is appealing the judgment and sentence in his supervised released case and recognizes that his failure to return to the U.S. would likely result in a dismissal of his appeal.

11. Defendant sought concurrence in this matter pursuant to E.D. Mich. LR 7.1(a) and it was denied.

Respectfully submitted,

**FEDERAL COMMUNITY DEFENDER
EASTERN DISTRICT OF MICHIGAN**

s/Andrew Densem

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Dated: April 24, 2024

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
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UNITED STATES OF AMERICA,

Plaintiff,

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v.

HON. TERRENCE G. BERG

YOUSEF RAMADAN,

Defendant.

**BRIEF IN SUPPORT OF
MOTION FOR TEMPORARY MODIFICATION OF SUPERVISED
RELEASE CONDITION**

I. Authority to Modify Conditions of Supervised Release

Defendant re-alleges the factual representation made in his Motion for Temporary Modification of Supervised Release Condition. This Court has the authority, pursuant to 18 U.S.C. § 3583(3)(2), to amend the previous order of supervised release.

CONCLUSION

Based on the foregoing, Defendant respectfully requests this Honorable Court temporarily modify the conditions of his supervised release and allow him to travel outside the United States in order to attend his brother's wedding in Palestine.

Respectfully submitted,

**FEDERAL COMMUNITY DEFENDER
EASTERN DISTRICT OF MICHIGAN**

s/Andrew Densemo

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CERTIFICATE OF SERVICE

I, hereby certify that on April 24, 2024, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Doug Salzenstein
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s/Andrew Densemo
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Dated: April 24, 2024